

LAW OFFICES OF
JOSHUA L. DRATEL, P.C.
A PROFESSIONAL CORPORATION

29 BROADWAY
Suite 1412
NEW YORK, NEW YORK 10006

TELEPHONE (212) 732-0707
FACSIMILE (212) 571-3792
E-MAIL: JDratel@JoshuaDratel.com

JOSHUA L. DRATEL

—
LINDSAY A. LEWIS
WHITNEY G. SCHLIMBACH

STEVEN WRIGHT
Office Manager

September 24, 2014

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 9/25/14

Re: United States v. Antione Chambers,
S1 13 Cr. 345 (LGS)

Dear Judge Schofield:

In response to the Court's preliminary decision denying without prejudice Mr. Chambers's Motion to admit the testimony of an expert witness with respect to eyewitness identification, this letter enumerates the specific subject matter that such expert witness, Professor Deryn Strange, PhD, an Associate Professor at John Jay College of Criminal Justice, would cover in her testimony, as part of the defense case, relevant to the purported eyewitness identification of Mr. Chambers made by prosecution witnesses. It is anticipated that Professor Strange's testimony will cover the following subjects:

1. the impact of the immediate conditions during the witness's initial viewing;
2. the nature of cross-racial identifications;
3. the phenomenon of weapon focus or weapon distraction;
4. the impact of exposure to serial photo arrays on the reliability of an identification;
5. the impact of a single photo identification procedure, during which the name of the photographed individual is revealed, on the reliability of an identification;

6. the possibility of contamination resulting from a relationship between witnesses; and,
7. the effect of the passage of time between the event and the first identification procedure.

Each of these items conforms to facts present in the case, as set forth in the defendant Antione Chambers's Motion and Motion for Reconsideration, at Docket No. 148. Also provided is a copy of Professor Strange's CV.

Respectfully submitted,



Joshua L. Dratel

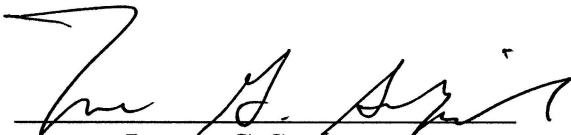
JLD/

cc: Negar Tekeei
Santosh Aravind
Assistant United States Attorneys

The Government's response to this letter (Dkt. 164), if any, shall be filed no later than September 27, 2014.

SO ORDERED.

Dated: September 25, 2014
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE